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6 **UNITED STATES BANKRUPTCY COURT**  
7  
8 **DISTRICT OF NEVADA**

9 In re:

10 URSULA LICHTENSTEIN,  
11 Debtor.

Case No. 25-10340-nmc

Chapter 13

Date of Hearing: April 8, 2025

Time of Hearing: 2:00 p.m.

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16 **DECLARATION OF DEBTOR**

17 COMES NOW, the Debtor URSULA LICHTENSTEIN , by and through her counsel,  
18 and files the attached Declaration.

19 Dated this 14th day of March 2025.

20 WILDE & ASSOCIATES, LLC.

21 /s/ Gregory Wilde  
22 Gregory L. Wilde, Esq.  
23 Counsel for Debtor  
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DECLARATION IN SUPPORT OF MOTION TO HOLD CREDITOR LAS VEGAS JAYCEES  
SENIOR CITIZEN MOBILE HOME PARK IN CONTEMPT FOR VIOLATION OF THE  
AUTOMATIC STAY UNDER §362(a) AND FOR ACTUAL DAMAGES, EMOTIONAL  
DISTRESS DAMAGES, PUNITIVE DAMAGES  
AND ATTORNEY FEES

URSULA LICHTENSTEIN declare, under the penalty of perjury of laws of the State of Nevada and the United States, as follows:

I am the Debtor in the above entitled case, seventy-seven (77) years of age, currently collecting social security as my only source of income, and currently residing in my 1994 Champion, Infinity I, Manufactured Home.

I am currently a resident at the Las Vegas Jaycees Senior Citizen Mobile Home Park ("JAYCEES") located at 505 West Harmon Avenue, Las Vegas, Nevada 89103, where my mobile home occupies Space #305. ("PARK").

ROBERT DEKEN is the park manager and representative of the JAYCEES.

JAYCEES commenced eviction proceedings against me in March 2024, claiming that I violated the lease agreement and Park rules.

On January 2, 2025, the Las Vegas Justice Court entered formal Findings of Fact and Conclusions of Law, staying the issuance of the Writ for five judicial days but had not entered a final order of judgment prior to me filing this Chapter 13 proceeding.

On January 21, 2025, I filed these Chapter 13 proceedings in order to sell my mobile home since I do not have any money to move somewhere else.

On February 6, 2025, my attorney and I agreed with the JAYCEES to vacate the stay for the sole purpose of determining the monetary amount so it could file a proof of claim in my bankruptcy.

I am also being charged for allegedly taking advantage of a fellow resident at the PARK, Justice Court Case No. 24-CR-106980.

MANAGER was in attendance at my preliminary arraignment hearing wherein the criminal court judge told me that I had to "turnover the mobile home". I believe that the judge could not have known about the eviction situation without having been informed and persuaded by MANAGER of the JAYCEES.

MANAGER continued to harass me calling and telling me, among other things, if I paid I could stay in the PARK. When I asked how much, he would not provide an amount and ultimately

claimed that the management company was in "charge now".

MANAGER also called me and commented that he could "pick this place up cheap" referring to my manufactured home and that I would "have to do a fire sale".

On another occasion, MANAGER called and stated; "I have received thirty-six (36) phone calls today asking me why you are still here, making me look bad."

On another occasion, I received a sexually explicit video clip on my phone from the MANAGER's phone number and went to the office to confront him but he denied doing so.

Most recently, various people contacted me saying that the MANAGER is contacting residents of the Park asking them to claim that I threatened to take his life. To the best of my knowledge, no one has agreed and I have never threatened him.

I am keeping a phone log of the number and dates of the incoming calls from MANAGER and will provide the same to the Court if necessary.

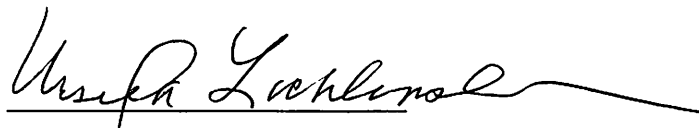
I am trying to sell my manufactured home but someone has removed two different "For Sale" signs from the property and I believe that it is the MANAGER of the Park.

On February 18, 2025, MANAGER, acting on behalf of JAYCEES, processed a "Notice of 108 Lien" with the Department of Business and Industry Nevada Housing Division-Manufactured Housing, against me and my manufactured home. "Lien on me Sister" processed the Lien for JAYCEES and sent it to me via certified mail.

I have suffered from extreme anxiety, distress, and emotional damage caused by the receipt of the notice of lien via certified mail and the harassment from MANAGER. I am very frightened by the threatening acts in the notice and fear I will lose my manufactured home.

So far, I have suffered actual damages in the form of travel costs and therapy visits, as well as attorney fees.

DATED 3/11/25

A handwritten signature in black ink, appearing to read "Ursula Lichtenstein", written over a horizontal line.

URSULA LICHTENSTEIN